

Law Office of Brian J. Muhlbaier
309 Fellowship Road
Suite 200
Mount Laurel NJ 08054
(856) 692-0440
Attorney for Movant

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Tanisha Green
Debtors

**CHAPTER 13
CASE NO.: 23-17427-ABA**

**NOTICE OF MOTION TO
VACATE THE AUTOMATIC STAY, AND FOR PROSPECTIVE RELIEF.**

HEARING DATE AND TIME:

TO: Isabel Balboa, Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002

Tanisha Green

PLEASE TAKE NOTICE that on _____ at _____ A.M. or as soon thereafter as counsel may be heard, the undersigned will apply to the Honorable Judge Burns, Bankruptcy Judge, at the United States Bankruptcy Court, 15 North Seventh Street, Camden, NJ 08102-1104 for an Order compelling the debtor to assume or reject the residential real estate lease and for Prospective Relief from the Automatic Stay for premises known as 1480 S. Maple Dr. Apt. C-2 Vineland NJ 08360

In support of this motion, the party will rely upon the Certification submitted herewith and oral argument.

Law Office of Brian J. Muhlbaier
By: _____ //s// _____
BRIAN J. MUHLBAIER, Attorney for
Movant